

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
WESTERN DIVISION

AARON E. YOUNG,)	CASE NO. 3:17-cv-02426
)	
Plaintiff,)	JUDGE JEFFREY HELMICK
v.)	
)	<u>ANSWER OF DEFENDANTS</u>
MANAGEMENT & TRAINING)	<u>MANAGEMENT & TRAINING</u>
CORPORATION, <i>et al.</i>)	<u>CORPORATION; MTC MEDICAL, LLC;</u>
)	<u>TURNER; JOYCE; SHULER;</u>
Defendants.)	<u>QUINTERO; DONOHUE; CRAIG;</u>
)	<u>SMITH; AND BLANKENSHIP TO</u>
)	<u>PLAINTIFF'S AMENDED COMPLAINT</u>
)	
)	<u>(JURY DEMAND ENDORSED HEREON)</u>

Defendants, Management & Training Corporation; MTC Medical, LLC; Warden Neil Turner; Deputy Warden Becky Joyce; Major Ruben Quintero; Healthcare Administrator Vicky Donohue; Institution Inspector Lori Shuler; Unit Manager Administrator James Craig; Sergeant Benjamin Blankenship; and Case Manager, Kea Smith ("Defendants"), by and through counsel, for their answer to the Amended Complaint:

FIRST DEFENSE

1. Admit that Plaintiff is alleging claims, but deny any violation of constitutional rights and deny the remaining allegations contained in Paragraph 1 of the Amended Complaint.
2. Admit jurisdiction and venue is proper in the Northern District of Ohio, but deny the remaining allegations contained in Paragraph 2 of the Amended Complaint.
3. Admit the allegations contained in Paragraphs 3 through 5, inclusive, of the Amended Complaint.

4. Admit Defendants Warden Neil Turner; Deputy Warden Becky Joyce; Major

5. Ruben Quintero; Healthcare Administrator Vicky Donohue; Institution Inspector Lori Shuler; Unit Manager Administrator James Craig; Sergeant Benjamin Blankenship; and Case Manager, Kea Smith and Sergeant Benjamin Blankenship are or were employees of MTC at one point, but deny the remaining allegations contained in Paragraph 6 of the Amended Complaint.

6. Admit that a Tuberculosis screening was held at NCCC on October 24, 2016, but deny the remaining allegations contained in Paragraph 7 of the Amended Complaint.

7. Deny the allegations contained in Paragraphs 8 through 13, inclusive, of the Amended Complaint.

8. Deny any violation of constitutional rights and deny all other allegations contained in Paragraphs 14 through 17, inclusive, of the Amended Complaint.

9. Deny the allegations contained in Paragraphs 18 through 20, inclusive, of the Amended Complaint.

10. Deny that Plaintiff is entitled to relief as alleged in Paragraphs 21 through 23, inclusive, of the Amended Complaint.

11. Deny each and every allegation contained in the Amended Complaint save and except those expressly admitted herein to be true.

SECOND DEFENSE

12. The Amended Complaint fails to set forth against Defendants a claim upon which relief might be granted.

THIRD DEFENSE

13. Plaintiff failed to exhaust all administrative remedies.

FOURTH DEFENSE

14. Defendants are entitled to immunity or good faith immunity for the claims for relief set forth in the Amended Complaint.

FIFTH DEFENSE

15. Plaintiff's own actions or omissions are wholly responsible for the damages alleged.

SIXTH DEFENSE

16. There has been a failure of service or a failure of process.

SEVENTH DEFENSE

17. Defendants reserve the right to assert additional defenses as such additional defenses should become available during the course of discovery herein.

A TRIAL BY JURY IS DEMANDED HEREIN.

/s/ Kenneth E. Smith

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Counsel for Defendants

CERTIFICATE OF SERVICE

A copy of the foregoing *ANSWER OF DEFENDANTS MANAGEMENT & TRAINING CORPORATION; MTC MEDICAL, LLC; TURNER; JOYCE; SHULER; QUINTERO; DONOHUE; CRAIG; SMITH; AND BLANKENSHIP TO PLAINTIFF'S AMENDED COMPLAINT* has been filed electronically with the Court on this 25th day of April 2018. Notice of this filing will be sent to the parties by operation of the Court's electronic filing system.

I hereby certify that a true and accurate copy of the foregoing was served via U.S. Mail this date upon the following:

Aaron E. Young (625294)
Mansfield Correctional Institution
P.O. Box 788
Mansfield, Ohio 44901

Plaintiff pro se

/s/ Kenneth E. Smith
KENNETH E. SMITH (0090761)
Counsel for Defendants